

REMARKS

The Advisory Action dated February 8, 2005, has been received and carefully considered. Reconsideration of the outstanding rejections in the present application is respectfully requested based on the above amendments and following remarks.

Applicants incorporate herein by reference and reiterates the arguments presented in previous papers. Applicants have also amended claims 1, 6 and 11 in an effort to advance the prosecution of the present application.

In the Advisory Action, the Examiner has maintained the rejections from the Final Office Action and provided further clarification for the asserted motivation to combine references. The Examiner states:

[t]he examiner's cited portion of the reference only mentions that the language by McGuire bears similarity in construct of C/C++ language. That cannot be equated to the assertion that the two programming language (e.g., C/C++ and Scheme) are interchangeable as put forth by the Applicants. Similarities in construct of two programming languages according to one of ordinary skill in the art would be sufficient to set forth the rationale of the 103 rejection.

Thus, the Examiner's apparently agrees with Applicants' position that it would be an improper reading of McGuire to say that McGuire teaches the equivalence of C/C++ and Scheme. Instead, the Examiner's position is that McGuire is sufficient to demonstrate that the level of ordinary skill in the art is such that practitioners would know how to convert the programs disclosed in Piazza to C/C++ or Scheme or some other object language. Applicants respectfully disagree with the Examiner's assertion. Piazza does not disclose how his system can be presented in C/C++ and, at its best, the statement in McGuire merely points out that there are some similarities in object oriented languages. However, with their Response filed 12/6/04, Applicants have provided additional evidence that the Examiner's assessment of the level of ordinary skill is incorrect and that it would not be obvious to convert Piazza to C/C++. For example, the previously submitted Appendix B (pages from a university website¹) highlight the fact that C++ and Scheme are not interchangeable languages. As stated on this website:

¹ Website titled "An introduction to Scheme for C programmers" accessed by Applicants' undersigned representative on Dec. 2, 2004, at the address: www.cs.caltech.edu/courses/cs1/resources/scheme-for-c-programmers.html.

scheme and C each encourage a very different style of programming (and of thinking), and there are a large number of differences between the two languages, ... knowledge of C will not only not help you when you learn scheme, it may actually make the process more difficult ... a lot of the programs that you have to write [for this course using scheme]... will either not be (directly) writable in C or else would be much more difficult to write in C. (Emphasis added).

Therefore, Applicants respectfully submit that, contrary to the Examiner's suggestion, it would not have been obvious to one of ordinary skill in the art to substitute a compiler for a Scheme/Lisp language for a C/C++ compiler due to the numerous, difficult and conceptual differences between the languages.

In addition, and in a further effort to advance prosecution, Applicants have amended claims 1, 6 and 11 to explicitly recite the "the first multi-tasking property comprises a property relating to a preemptive multitasking model" and "the second multi-tasking property comprises a property relating to a run-to-completion model." Applicants respectfully submit that that applied references do not suggest or disclose these features either.

I. CONCLUSION

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0206, and please credit any excess fees to the same deposit account.

Respectfully submitted,
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